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THRU: K.H. Malone, Jr., Region VI FITOM

THRU: Tim A. Hall, Region VI AFITOM At A TAN

FROM : Tom Rountree, FIT Engineering Technologist

DATE: July 13, 1988

SUBJ.: PA Reassessment Kerr-Ban Furniture Manufacturing Co., San Marcos, TX,

TDD# F-6-8804-30, CERCLIS# TXD490012317, PAN# FTX0739PAA.

FTT was instructed to perform a PA reassessment on Kerr-Ban Furniture Manufacturing Co. The original PA was done in February, 1983 and classified the site as needing no further action.

Kerr-Ban manufactured furniture until mid-1982 when the facility was purchased by the Wide-Lite Corporation, also located in San Marcos. When operating, Kerr-Ban produced solvent, oil base stain, and lacquer/thinner wastes. Currently, it is not known if the Wide-Lite Corp. is using the Kerr-Ban facility to manufacture their products, which are electrical fixtures.

Kerr-Ban came to the attention of the TWC in 1977 when they submitted an application for a solid waste permit and listed an on-site pit for disposal of wastes. When it was learned that the pit was unlined, the TWC strongly urged Kerr-Ban not to dispose of any wastes in the pit. During a 1981 inspection, the TWC discovered that in addition to dumping into the unlined pit, drums of waste were open and evidence of past spills were noted. Also, an abandoned landfill was found containing several drums of solidified material. Kerr-Ban stated that they were unaware of this abandoned drum landfill. In November 1981, TWC reinspected the property and found that none of the three areas of concern had been addressed. The TWC then notified Kerr-Ban that the pit would either have to be recorded on the property deed records or remediated. Kerr-Ban chose to remove the areas of concern. In March 1982, TWC representatives witnessed the removal of the problem areas and concluded that the site was satisfactorily remediated. However, no post-remedial sampling was done. The TWC representative who witnessed the removal action said that all of the problem areas had been cleaned up. Additional interviews could not confirm the exact use of the site at this time, but the TWC representative said he is fairly sure that the site is not being used for manufacturing.

FIT recommends a Site Inspection be performed to determine if the problem areas have been adequately removed.

